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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CHAPTER 11
	§	
NATIONAL RIFLE ASSOCIATION OF AMERICA and SEA GIRT LLC,	§	CASE NO. 21-30085-hdh11
	§	
DEBTORS¹	§	Jointly Administered

**DEBTORS' WITNESS AND EXHIBIT LIST FOR HEARING ON DEBTORS'S
APPLICATION FOR ENTRY OF AN ORDER PURSUANT TO SECTIONS 105(A),
327(E), 329 AND 1107(B) OF THE BANKRUPTCY CODE AUTHORIZING AND
APPROVING THE EMPLOYMENT AND RETENTION EFFECTIVE AS OF THE
PETITION DATE OF BREWER, ATTORNEYS & COUNSELORS AS SPECIAL
COUNSEL FOR THE DEBTORS AND DEBTORS IN POSSESSION²**

The National Rifle Association of America and Sea Girt LLC (the "Debtors") may call the following witnesses and introduce the following exhibits in connection with the Debtors'

¹ The last four digits of the Debtors' taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors' mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

² The hearing on the Application is currently scheduled for March 4, 2021. The Debtors reserve the right to supplement the list based on, inter alia, their review of submissions that were filed only recently.

Application for Entry of an Order Pursuant to Sections 105(a), 327(e), 329 and 1107(b) of the Bankruptcy Code Authorizing and Approving the Employment and Retention Effective as of the Petition Date of Brewer, Attorneys & Counselors as Special Counsel for the Debtors and Debtors in Possession [Docket No. 84].

I. WITNESSES

1. The Debtors reserve the right to call the following individuals as witnesses at the Hearing:
 - a. Michael J. Collins;
 - b. John Frazer;
 - c. Charles Cotton;
 - d. Willes Lee;
 - e. Any witness necessary to authenticate the exhibits designated herein;
 - f. Any witness necessary to rebut and/or impeach the testimony of a witness called or designated by any other party;
 - g. Any witness(es) identified or called by any other parties in interest; and
 - h. Rebuttal witnesses, as necessary.

II. EXHIBITS

2. The Debtors reserve the right to introduce the following documents as exhibits:

EXHIBIT No.	DESCRIPTION
1	Declaration of Michael J. Collins in Support of the Application [Docket No. 84-2]
2	Declaration of Carolyn Meadows in Support of the Application [Docket No. 84-3]
3	Declaration of John Frazer in Support of the Application [Docket No. 84-4]

4	March 22, 2019 email from Oliver North to John Frazer regarding “CONFIDENTIAL DOCUMENTS” with attachments
5	Letter from W. LaPierre to R. Childress
6	Morgan Lewis Memorandum, dated March 21, 2019 (redacted)
7	April 11, 2019 email from Oliver North to John Frazer and Charles Cotton” (attaching documents)
8	Letter from Wayne LaPierre to Oliver North
9	Letter from Wayne LaPierre letter dated April 25, 2019 to Members of the Board of Directors
10	Minutes of the Meeting of the Board of Directors of the National Rifle Association of America, dated April 29, 2019
11	National Rifle Association Financial Disclosure Questionnaire of Richard Childress, dated January 9, 2016
12	National Rifle Association Financial Disclosure Questionnaire of Richard Childress, dated December 7, 2017
13	April 24, 2019 Plaintiff the National Rifle Association of America Amended Complaint in <i>The National Rifle Association v. Ackerman McQueen, Inc. et al.</i> , Case No. CL19001757 (Va. Cir. Ct. 2019)

14	Defendants' Motion and Memorandum of Law in Support of Defendants' Motion to Disqualify Plaintiffs Counsel (William A. Brewer III and Brewer Attorneys & Counselors) in <i>The National Rifle Association v. Ackerman McQueen, Inc. et al.</i> , Case.No. 3:19-cv-2074 (N.D. Tex. 2019) Docket No. 78, 79-2.
15	<i>Brewer v. Lennox Hearth Prod., LLC</i> , 601 S.W.3d 704 (Tex. 2020)
16	Plaintiff's Second Amended Complaint in <i>The National Rifle Association v. Ackerman McQueen, Inc. et al.</i> , Case.No. 3:19-cv-2074 (N.D. Tex. 2019) Docket No. 201-1.
17	Defendant The National Rifle Association of America's Verified Answer and Counterclaims in <i>People of the State of New York v. The National Rifle Association et al.</i> , Index.No. 451625/2020 (Sup. Ct. N.Y.) NYSCEF Docket No. 230.
18	Declaration of Wayne LaPierre dated May 3, 2020 in support of the NRA's Opposition to Defendants' Motion to Disqualify Plaintiffs Counsel (William A. Brewer III and Brewer Attorneys & Counselors)
19	Defendant Ackerman McQueen's Motion for Preliminary Injunction, dated June 19, 2019, in <i>The National Rifle Association v. Ackerman McQueen, Inc. et al.</i> , CaseNo. CL19001757 (Va. Cir. Ct. 2019).
20	June 25, 2019 letter from Andrew Arulanandam to Revan McQueen
21	September 5, 2018 email from Stephen Ryan to William Brewer, CCing Gina Betts and Jay Madrid
	Any exhibit(s) offered or introduced by any other parties
	Rebuttal exhibits, as necessary

3. The Debtors reserve the right to supplement this Witness and Exhibit List.

Dated: March 1, 2021

Respectfully submitted,

/s/Patrick J. Neligan, Jr.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 1st day of March 2021 a true and correct copy of the foregoing was served electronically via this Court's CM/ECF notification system.

/s/ Michael J. Collins

Michael J. Collins